

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
SOUTHEASTERN DIVISION

TRAVIS W. GIBSON,	)	
	)	
Plaintiff,	)	
	)	Case No. 1:16-cv-00261-SNLJ
v.	)	
	)	
STATE OF MISSOURI, et al.	)	
	)	
Defendants.	)	

**DEFENDANTS' MOTION TO DISMISS**

Defendants State of Missouri, Missouri Department of Corrections, Missouri Highway Patrol, Roxanne Cook, and JoAnn Snider, by and through counsel, move this Court pursuant to Federal Rule of Civil Procedure 12(b)(6) to dismiss Plaintiff's Complaint (Doc. 4) for failure to state a claim upon which relief can be granted. A memorandum in support of this motion is filed contemporaneously herewith.

WHEREFORE, Defendants respectfully request this Court dismiss Plaintiff's Complaint and award them any additional relief deemed just and proper.

Respectfully submitted,

**CHRIS KOSTER**

Missouri Attorney General

/s/ Colleen Joern Vetter

COLLEEN JOERN VETTER

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*Attorneys for Defendants*

*State of Missouri, Missouri Department  
of Corrections, Missouri Highway Patrol,  
Roxanne Cook, and JoAnn Snider*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing was filed electronically with the Clerk of Court on November 16, 2016 to be served by operation of the Court's electronic filing system upon all parties.

/s/ Colleen Joern Vetter

COLLEEN JOERN VETTER

Assistant Attorney General